

**Commonwealth of Kentucky
Division for Air Quality**

PERMIT APPLICATION SUMMARY FORM

Reviewed by: Ralph Gosney, P.E.

GENERAL INFORMATION:

Source Name: Noveon, Inc.
Mailing Address: 2468 Industrial Pkwy, P.O. Box 1498, Calvert City,
Kentucky 42029
Date application received: December 19, 2003; resubmitted on March 16, 2006;
Supplemental information received on June 6, 2004 and
September 7, 2006
SIC/Source description: 2821, *Plastic Materials, Synthetic Resins, and
Nonvulcanizable Elastomer*
Source ID #: 21-157-00060
Source A.I. #: 46166
Activity #: APE20040001
Permit number: F-05-051

APPLICATION TYPE/PERMIT ACTIVITY:

<input checked="" type="checkbox"/> Initial issuance	<input type="checkbox"/> General permit
<input type="checkbox"/> Permit modification	<input checked="" type="checkbox"/> Conditional major
__Administrative	<input type="checkbox"/> Title V
__Minor	<input checked="" type="checkbox"/> Synthetic minor
__Significant	<input type="checkbox"/> Operating
<input type="checkbox"/> Permit renewal	<input checked="" type="checkbox"/> Construction/operating

COMPLIANCE SUMMARY:

☐ Source is out of compliance ☐ Compliance schedule included
☒ Compliance certification signed

APPLICABLE REQUIREMENTS LIST:

☐ NSR ☐ NSPS ☒ SIP
☐ PSD ☒ NESHAPS ☐ Other
☐ Netted out of PSD/NSR ☐ Not major modification per 401 KAR 51:001, 1(116)(b)

MISCELLANEOUS:

☐ Acid rain source
☐ Source subject to 112(r)
☒ Source applied for federally enforceable emissions cap
☐ Source provided terms for alternative operating scenarios
☐ Source subject to a MACT standard
☐ Source requested case-by-case 112(g) or (j) determination
☐ Application proposes new control technology
☒ Certified by responsible official
☐ Diagrams or drawings included
☐ Confidential business information (CBI) submitted in application
☐ Pollution Prevention Measures
☐ Area is non-attainment (list pollutants):

EMISSIONS SUMMARY:

Pollutant	Actual (tpy) ¹	Potential (tpy)
PM/PM ₁₀	5.09	9.91
SO ₂	0.01	0.01
NO _x	1.15 ²	1.15
CO	0.68	0.96
VOC	3.16	< 90 ³
Lead	--	--
Individual HAP > 10 tpy	None	< 9 ³
Total HAPs > 25 tpy	N/A	< 25 ³

1. Actual emissions are from the Kentucky Division for Air Quality's 2005 Emissions Inventory printout report.
2. The actual emissions of NO_x in the Kentucky Division for Air Quality's 2005 Emissions Inventory printout report was greater than the calculated potential emissions; therefore the actual NO_x emissions were set equal to the potential emissions.
3. Federally enforceable source emission limitations established in the permit.

SOURCE DESCRIPTION:

Noveon, Inc. has accepted permit conditions to limit the facility's potential to emit (PTE) below major source thresholds, and the source is classified as a "nonmajor source" pursuant to 401 KAR 52 and 40 CFR 70. Therefore, the source is subject to the provision of 401 KAR 52:030. Inclusive of the emission and operating caps described below, the facility qualifies as a conditional major/synthetic minor emission source by use of control devices to limit emissions.

EMISSION AND OPERATING CAPS DESCRIPTION:

Marshall County is designated as attainment for all criteria pollutants. To preclude the applicability of 401 KAR 51:017, *Prevention of Significant Deterioration of Air Quality*, and 401 KAR 52:020, *Title V Permits*, the following sourcewide emission limits shall apply:

- i. Volatile organic compound (VOC) emissions: 90 tons per year;
- ii. Combined hazardous air pollutant (HAP) emissions: 22.5 tons per year; and
- iii. Single hazardous air pollutants (HAPs) emissions: 9 tons per year.

In order to make the conditional major/synthetic minor emission limits enforceable as a practical matter, Noveon, Inc. has voluntarily accepted limits of Carbopol® production in any twelve (12) consecutive month period as follows:

- i. Carbopol® using benzene as the carrier: 14,000,000 lbs per year;
- ii. Carbopol® using ethyl acetate as the carrier: 12,000,000 lbs per year; and
- iii. Carbopol® using the cosolvent as the carrier: 22,556,000 lbs per year.

OPERATIONAL FLEXIBILITY:

There were no alternative operating scenarios proposed by the source; However, alternate operating scenarios are included in the permit based on applicable requirements in 40 CFR Part 61 regulations.